

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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|   |   | APR 12 P 5:32                    |
| DEBORAH CHIN, On Behalf of Herself<br>and All Others Similarly Situated,  | : | Civil Action No. 04-CV-10294-DPW |
| Plaintiff,  | : | Hon. Douglas P. Woodlock         |
| v.  | : |                                  |
| SONUS NETWORKS, INC., HASSAN<br>AHMED, and STEPHEN J. NILL,   | : |                                  |
| Defendants.   | : |                                  |
| INFORMATION DYNAMICS, LLC, On<br>Behalf of Itself and All Others Similarly<br>Situated,                                 | : | Civil Action No. 04-CV-10308-DPW |
| Plaintiff,  | : | Hon. Douglas P. Woodlock         |
| v.  | : |                                  |
| SONUS NETWORKS, INC., PAUL R.<br>JONES, EDWARD N. HARRIS, J.<br>MICHAEL O'HARA, HASSAN M.<br>AHMED and STEPHEN J. NILL, | : |                                  |
| Defendants.   | : |                                  |

**MOTION OF PLAINTIFF SAVERIO  
PUGLIESE FOR CONSOLIDATION AND FOR APPOINTMENT OF  
LEAD PLAINTIFF, LEAD COUNSEL AND LIAISON COUNSEL**

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| MICHELLE TREBITSCH, On Behalf of<br>Herself and All Others Similarly<br>Situated, | : | Civil Action No. 04-CV-10307-DPW |
| Plaintiff,  | : | Hon. Douglas P. Woodlock         |
| v.  | : |                                  |
| SONUS NETWORKS, INC., HASSAN<br>AHMED, and STEPHEN J. NILL,                       | : |                                  |
| Defendants.   | : |                                  |
| PETER KALTMAN, Individually and<br>On Behalf of All Others Similarly<br>Situated, | : | Civil Action No. 04-CV-10309-DPW |
| Plaintiff,  | : | Hon. Douglas P. Woodlock         |
| v.  | : |                                  |
| SONUS NETWORKS, INC., HASSAN<br>AHMED, and STEPHEN J. NILL,                       | : |                                  |
| Defendants.   | : |                                  |
| SAMANTHA DEN, Individually and on<br>Behalf of All Others Similarly Situated,     | : | Civil Action No. 04-CV-10310-DPW |
| Plaintiff,  | : | Hon. Douglas P. Woodlock         |
| v.  | : |                                  |
| SONUS NETWORKS, INC., HASSAN<br>AHMED, and STEPHEN J. NILL,                       | : |                                  |
| Defendants.   | : |                                  |

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| RICHARD CURTIS, on Behalf of<br>Himself and All Others Similarly<br>Situated,   | : | Civil Action No. 04-CV-10314-MLW |
| Plaintiff,  | : | Hon. Mark L. Wolf                |
| v.  | : |                                  |
| SONUS NETWORKS, INC., HASSAN<br>AHMED, and STEPHEN J. NILL,                     | : |                                  |
| Defendants.   | : |                                  |
| RONALD KASSOVER, on Behalf of<br>Himself and All Others Similarly<br>Situated,  | : | Civil Action No. 04-CV-10329-DPW |
| Plaintiff,  | : | Hon. Douglas P. Woodlock         |
| v.  | : |                                  |
| SONUS NETWORKS, INC., HASSAN<br>AHMED, and STEPHEN J. NILL,                     | : |                                  |
| Defendants.   | : |                                  |
| STEVE L. BAKER, Individually and on<br>Behalf of All Others Similarly Situated, | : | Civil Action No. 04-CV-10333-DPW |
| Plaintiff,  | : | Hon. Douglas P. Woodlock         |
| v.  | : |                                  |
| SONUS NETWORKS, INC., HASSAN<br>AHMED, and STEPHEN J. NILL,                     | : |                                  |
| Defendants.   | : |                                  |

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| MICHAEL KAFFEE, on Behalf of<br>Himself and All Others Similarly<br>Situated,<br><br>v.<br><br>SONUS NETWORKS, INC., HASSAN<br>AHMED, and STEPHEN J. NILL,<br><br>Defendants.        | : | Civil Action No. 04-CV-10345-DPW<br><br>Hon. Douglas P. Woodlock |
| HAIMING HU, Individually and on<br>Behalf of All Others Similarly Situated,<br><br>v.<br><br>SONUS NETWORKS, INC., HASSAN<br>AHMED, and STEPHEN J. NILL,<br><br>Defendants.          | : | Civil Action No. 04-CV-10346-DPW<br><br>Hon. Douglas P. Woodlock |
| CHARLES STARBUCK, Individually<br>and on Behalf of All Others Similarly<br>Situated,<br><br>v.<br><br>SONUS NETWORKS, INC., HASSAN<br>AHMED, and STEPHEN J. NILL,<br><br>Defendants. | : | Civil Action No. 04-CV-10362-DPW<br><br>Hon. Douglas P. Woodlock |

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| SAMUEL HO, Individually and on Behalf of All Others Similarly Situated,<br><br>Plaintiff<br><br>v.<br><br>SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,<br><br>Defendants.                   | : | Civil Action No. 04-CV-10363-DPW<br><br>Hon. Douglas P. Woodlock |
| JEFFREY C. RODRIGUES, Individually and on Behalf of All Others Similarly Situated,<br><br>Plaintiff,<br><br>v.<br><br>SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,<br><br>Defendants.       | : | Civil Action No. 04-CV-10364-DPW<br><br>Hon. Douglas P. Woodlock |
| ROBERT CONTE and MARK RESPLER, On Behalf of Themselves and all Others Similarly Situated,<br><br>Plaintiff<br><br>v.<br><br>SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,<br><br>Defendants. | : | Civil Action No. 04-CV-10382-DPW<br><br>Hon. Douglas P. Woodlock |

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| WHEATON ELECTRICAL SERVICES<br>RETIREMENT 401K PROFIT<br>SHARING, On Behalf of Itself and All<br>Others Similarly Situated,                         | : | Civil Action No. 04-CV-10383-DPW<br><br>Hon. Douglas P. Woodlock |
| Plaintiff,<br><br>v.<br><br>SONUS NETWORKS, INC., HASSAN<br>AHMED, and STEPHEN J. NILL,   | : |  |
| Defendants.   | : |  |
| BRIAN CLARK, On Behalf of Himself<br>and All Others Similarly Situated,   | : | Civil Action No. 04-CV-10454-DPW<br><br>Hon. Douglas P. Woodlock |
| Plaintiff,<br><br>v.<br><br>SONUS NETWORKS, INC., PAUL R.<br>JONES, EDWARD N. HARRIS, J.<br>MICHAEL O'HARA, HASSAN M.<br>AHMED and STEPHEN J. NILL, | : |  |
| Defendants.   | : |  |
| SHEILA BROWNWELL, On Behalf of<br>Herself and All Others Similarly<br>Situated,   | : | Civil Action No. 04-CV-10597-DPW<br><br>Hon. Douglas P. Woodlock |
| Plaintiff,<br><br>v.<br><br>SONUS NETWORKS, INC., HASSAN<br>AHMED, and STEPHEN J. NILL,   | : |  |
| Defendants.   | : |  |
| SAVERIO PUGLIESE, On Behalf of<br>Himself and All Others Similarly<br>Situated,   | : | Civil Action No. 04-CV-10612-DPW<br><br>Hon. Douglas P. Woodlock |
| Plaintiff,<br><br>v.  | : |  |

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| SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,<br><br>Defendants.  | : |  |
| DAVID V. NOCITO, On Behalf of Himself and All Others Similarly Situated,<br><br>Plaintiff,<br><br>v.<br><br>SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, | : | Civil Action No. 04-CV-10623-DPW<br><br>Hon. Douglas P. Woodlock |
| Defendants.  | : |  |

**PLEASE TAKE NOTICE** that pursuant to Rule 42(a) of the Federal Rules of Civil Procedure and Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, as amended by the Private Securities Litigation Reform Act of 1995 ("PSLRA"), Plaintiff Saverio Pugliese ("Pugliese") will move this Court, at a time and place to be determined later, for an Order:

- (1) consolidating the above-captioned related actions filed on behalf of the purchasers of Sonus Networks, Inc. common stock;
- (2) appointing Pugliese as Lead Plaintiff in the above related actions under Section 21(D)(a)(3)(B) of the PSLRA; and
- (3) approving Pugliese's selection of Zwerling, Schachter & Zwerling, LLP as Lead Counsel and Berman DeValerio Pease Tabacco Burt & Pucillo as Liaison Counsel.

This motion is supported by the accompanying Memorandum of Law in Support of Motion of Plaintiff Saverio Pugliese for Consolidation and for Appointment of Lead Plaintiff, Lead Counsel and Liaison Counsel, the Affidavit of Richard Speirs in Support of Motion of Plaintiff Saverio Pugliese for Consolidation and for Appointment of Lead Plaintiff, Lead Counsel and Liaison Counsel together with the exhibits attached thereto, the [Proposed] Order Consolidating the Actions, Appointing Plaintiff and Saverio Pugliese Lead Plaintiff and Approving Lead Plaintiff's Choice of Lead Counsel and Liaison Counsel, all of the prior pleadings and proceedings had herein, and such other written and/or oral argument, as may be presented to the Court.

Dated: Boston, MA  
April 12, 2004

Respectfully submitted,

**BERMAN DEVALERIO PEASE  
TABACCO BURT & PUCILLO**

By: Nicole R. Starr  
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*Proposed Liaison Counsel for the Class*

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